

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

RICHARD CAMPFIELD, *et al.*

Case No. 2:15-cv-2733

Plaintiffs

Judge Michael H. Watson  
Magistrate Judge Chelsey M. Vascura

*v.*

SAFELITE GROUP, INC., *et al.*

Defendants

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**COMPENDIUM OF EXHIBITS IN SUPPORT OF PLAINTIFFS' PARTIAL MOTION  
FOR SUMMARY JUDGMENT ON THEIR LANHAM ACT CLAIM AND MOTION  
FOR SUMMARY JUDGMENT AS TO SAFELITE'S COUNTERCLAIM**

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Exhibit	Document Description	Bates
Tab 01	Exhibit 15 to the Deposition of Doug Herron, September 16, 2016, email from Patti Adams to Mike Lyons Re: Doug-2015 Financial Overview1.pptx	SL0065747-771
Tab 02	Exhibit 17 to the Deposition of Doug Herron, January 19, 2017, email from Tim Spencer to Senior Leadership Team Re: 15 - Tim Spencer - 2017 Performance Roadmap.pptx	SL0069031-048
Tab 03	Presentation dated March 5, 2012, Business Overview for Richard Tyler	SL0063247-289
Tab 04	Exhibit 15 to the Deposition of Peter Pearson, September 21, 2009, email from Pearson to David Erwin Re: Repair of Cracks	SL0006939-940
Tab 05	Transcript of the Deposition of Matthew Johnson dated January 24 and 25, 2018	
Tab 06	Transcript of the Deposition of Paul Syfko dated February 6, 2018	
Tab 07	June 12, 2007, Email from Paul Syfko to David Erwin Re: Training in s Cal	SL0004991-993

Tab 08	ANSI Publication - Repair of Laminated Automotive Glass, June 20, 2007	SL0005038-054
Tab 09	Exhibit 69 to the Deposition of Richard Campfield, ANSI Publication - Repair of Laminated Automotive Glass, February 11, 2014	
Tab 10	Exhibit 5 to the Deposition of Paul Syfko, March 15, 2007, email from Peg Stroka to various parties Re: ROGLAS Minutes from Orlando Meeting	SL0004946-949
Tab 11	Minutes of the Joint NGA-NWRA Repair of Auto Glass Standard (RAGS) Committee Meeting, November 2, 2004	SL0003754-758
Tab 12	Minutes Repair of Auto Glass Standards Committee Meeting, October 12, 2006	SL0004972-976
Tab 13	Exhibit 3 to the Deposition of Paul Syfko, Glass Medic FAQs	UB020787-789
Tab 14	Exhibit 1 to the Deposition of Paul Syfko, Plaintiffs' Rule 30(b)(6) Notice of Deposition of Defendants	
Tab 15	January 30, 2016, email from Pete Pearson to Pim Bemelmans Re: Crack Repair	SL0006972-973
Tab 16	Transcript of the Deposition of Doug Herron dated February 23, 2018	
Tab 17	Exhibit 20 to the Deposition of Doug Herron, Safelite Volume and Financial Information, 2010-2016	
Tab 18	Exhibit 16 to the Deposition of David L. Erwin, April 28, 2011, email from John Robinson to various parties Re: Belron Repair Standard - Work Group Kick off Session (KoS)	SL0080669-674
Tab 19	Exhibit 17 to the Deposition of David L. Erwin, July 1, 2011, email from Chris Davies to Paul Syfko FW: Belron Repair Standard - Safelite Response, plus attachment	SL0083720-722
Tab 20	Exhibit 9 to the Deposition of James D. McMillan, March 8, 2010, email from Gary Strain to McMillan and Blystone Re: Repair Standard - Important questions to be answered	SL0000120-122
Tab 21	September 21, 2009, email from Pete Pearson to David Erwin Re: Repair of Cracks	SL0006939-940

Tab 22	Exhibit 4 to the Deposition of Paul Syfko - Summary Sheet, Windshield Damage Survey Results, August 7, 2018	
Tab 23	Expert Report of Justin McLean, June 11, 2018	
Tab 24	DATA - Windshield Repair and Replacement - Ultra Bond 2012	UB088619-620
Tab 25	Auto Glass DATA, Ultra Bond Windshield Repair and Replacement 2013	UB088617-618
Tab 26	Auto Glass DATA, Ultra Bond Windshield Repair and Replacement 2014	UB088644-645
Tab 27	Supplemental Rebuttal Expert Report of Justin McLean, September 25, 2018	
Tab 28	Exhibit 17 to the Deposition of Paul Syfko, March 18, 2009, email from Paull Syfko to John@belron.com FW: Proper Installation & Repair Video Shoot on 3/25	SL0063856-875
Tab 29	Exhibit 16 to the Deposition of Jack Russell, December 16, 2009, email from Jack Russell to Greg Jones Re: Video Update	SL0008011-025
Tab 30	Exhibit 3 to the Deposition of David L. Erwin, August 27, 2009, email from Scott Gardner to various parties FW: Repair Training Update, plus attachment	SL0001131-132
Tab 31	Exhibit 13 to the Deposition of Paul Syfko, April 27, 2011, email from Syfko to Jack Russell Re: Follow-Up	SL0084204-263
Tab 32	Exhibit 1 to the Deposition of Brian D. O'Mara, Untitled Presentation	SL0004312-372
Tab 33	August 29, 2006, August 29, 2006, Email from Leo M. Cyr to David Erwin Re: New FAQ 20 & New website section	SL0004678-680
Tab 34	Safelite AutoGlass Improving Your View: "How to Perform a Proper Installation"	SL0008024-025
Tab 35	Video Script, Glass Installation (Replace) Video, March 15, 2009	SL0000406-414
Tab 36	Expert Report of Bob Beranek, September 22, 2018	
Tab 37	Presentation: Our newly enhanced & exclusive windshield repair solution	SL0067590-631

Tab 38	Exhibit 1 to the Deposition of Doug Herron, Plaintiffs' Rule 30(b)(6) Notice of Deposition of Defendants	
Tab 39	Exhibit 6 to the Deposition of Matthew Johnson, September 18, 2014, email from Matthew Perman to Paul Sykfo Re: 11-1101 TNC - Managing Repairs Not Possible (3).pptx	SL0055879-906
Tab 40	Transcript of the Deposition of Jack Russell dated March 2, 2018	
Tab 41	Exhibit 6 to the Deposition of Melina Metzger, November 2, 2011, email from Melina Metzger to Senior Leadership Team Re: Media Training, Message Triangles	SL0000076-082
Tab 42	Exhibit 4 to the Deposition of Brian D. O'Mara, May 29, 2009, email from Mark Placenti to Jack Russell FW: Repair info	SL0007252-278
Tab 43	Exhibit 23 to the Deposition of David L. Erwin, May 30, 2007, email from Paul Syfko to David Erwin	SL0005464
Tab 44	Exhibit 9 to the Deposition of Paul Syfko, February 18, 2008, email from Syfko to sLaporte@belrocanada.com Re: Gfraser@BelronCanada.com	SL0084201
Tab 45	Exhibit 19 to the Deposition of Matthew Johnson, July 2, 2008, email from Johnson to Mark Placenti Re: US Repair Standards	SL0009620-623
Tab 46	Exhibit 27 to the Deposition of David L. Erwin, August 1, 2011, email from Mark Klein to David Erwin Re: ROLGAS Compliance Issue	SL0008478-484
Tab 47	Transcript of the Deposition of Melina Metzger dated May 10, 2018	
Tab 48	Transcript of the Deposition of David L. Erwin dated February 27, 2018	
Tab 49	Transcript of the Deposition of James D. McMillan dated February 8, 2018	
Tab 50	Exhibit 4 to the Deposition of James D. McMillan, January 10, 2006, email from Dan Wilson to Dino Lanno Re: 18" Repair Standards - 18 inch cracks	SL0082970-972

Tab 51	Exhibit 14 to the Deposition of James D. McMillan, December 20, 2012, email from Jon Cardi to McMillan et al Re: Repair Education...Pit Repairs>>>	SL0080494-499
Tab 52	Exhibit 8 to the Deposition of David L. Erwin, Presentation, Your Role in Converting "Repairs Not Possible" to Replacements	SL0084091-111
Tab 53	November 18, 2008, email from Scott Gardner to Harrison, Syfko, Erwin Re: ROLGAS Committee to Vote on Changing Crack Limit to 6 Inches	SL0005646-647
Tab 54	February 13, 2015, email from Nathan Beckman Re: MRM - MDM Major Release Notification	SL0175959-968
Tab 55	SafeTech Repair Certification - Training manual and study guide	SL0088238-292
Tab 56	Exhibit 3 to the Deposition of Peter Pearson, September 17, 2007, email from David Erdner to Russell and Erwin Re: Flash Card	SL0007026-028
Tab 57	Publication, Windshield Damaged?	SL0009104-105
Tab 58	Exhibit 11 to the Transcript of the Deposition of Jack Russell, April 17, 2008, email from Lynn Johnson to Erwin and Russell Re: Windshield Repair for Continuing Education	SL0005294-333
Tab 59	Exhibit 12 to the Transcript of the Deposition of Jack Russell, April 24, 2009, email from Russell to Bridget McColgan Re: A.C.E. Files	SL0007687-733
Tab 60	Exhibit 13 to the Transcript of the Deposition of Jack Russell, July 17, 2009, email from Russell to Ivan Rodriguez Re: New Windshield Repair Brochure	SL0007935-978
Tab 61	Exhibit 15 to the Deposition of David L. Erwin, March 3, 2011, mail from Jack Russell to Fetzer and Poole Re: New "Controlling Vehicle Glass Losses" CE Course	SL0008139-203
Tab 62	February 9, 2017, email from Kenichi Oshida to Henry and Nickerauer Re: Progressive Slide Show for Review	SL0080736-759
Tab 63	Exhibit 10 to the Transcript of the Deposition of Jack Russell, April 21, 2011, email from Russell to Mabin Re: O'Brien	SL0082417-436
Tab 64	April 21, 2015, draft email, untitled	UB052368-369

Tab 65	Website printout, My damage	UB042433-434
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Tab 67	Video file produced in native format, filed separately	SL0084636
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Tab 70	Fathom website proposals	SL0001624-656
Tab 71	Fathom website proposals	SL0001443-444
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Tab 73	Audio file produced in native format, filed separately	SL0083058
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Tab 75	Audio file produced in native format, filed separately	SL0083063
Tab 76	Audio file produced in native format, filed separately	SL0083083
Tab 77	Script- "Car Wash" Enhancement - Safelite: 60	SL0010208
Tab 78	Safelite AutoGlass Arizona Jump Start Ad Series: "Don't risk your safety for a few free dinners" and "How much will that FREE windshield really cost you?"	SL0009725-730
Tab 79	Guest Column, Smart Glass Maintenance for Your Fleet	SL0009177-178
Tab 80	News Release, July 11, 2011, Industry Leader Safelite AutoGlass Launches New Enhanced Windshield Repair Solution	SL0006033
Tab 81	Transcript of the Deposition of Matthew Johnson dated January 24, 2018	
Tab 82	Exhibit 26 to the Deposition of Matthew Johnson, July 23, 2010, email from Mike Foth to Johnson Re: Editorial - revised	SL0010051-053
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Tab 84	Statement by [REDACTED] Pursuant to 28 U.S.C. §1746, April 30, 2018	

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Tab 89	Statement by [REDACTED], Pursuant to 28 U.S.C. §1746, May 22, 2018	
Tab 90	Statement by [REDACTED], Pursuant to 28 U.S.C. §1746, April 19, 2018	
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Tab 93	Transcript of the Deposition of Dale Sweigart dated August 1, 2019	
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Tab 96	Transcript of the Deposition of Curtis Conklin dated July 31, 2019	
Tab 97	Transcript of the Deposition of Brian Ladage dated January 24, 2019	
Tab 98	Transcript of the Deposition of Campfield, five volumes, dated May 30, 2018; May 2, 2018; June 1, 2018; December 4, 2018; and January 25, 2019	
Tab 99	Exhibit 36 to the Deposition of Dale Sweigart, April 9, 2010, email from Herve Silvy-Leligois to Syfko and Boekstein Re: Resin Comparison	SL0176038-041

Tab 100	Transcript of the Deposition of Donald Christensen dated February 5, 2019	
Tab 101	Declaration of Kurt B. Olsen, Esq., with Exhibits A-E	
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Tab 103	Declaration of Michael Twersky, Esq.	